

Hurand, Gates

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**From:** Patrick McDonnell <18.cv.00361@gmail.com>  
**Sent:** Tuesday, May 29, 2018 7:34 PM  
**To:** Hurand, Gates  
**Cc:** de Urioste, Alejandra; Oakland, David W.; Tomer, K. Brent; Giglio, Christopher  
**Subject:** Completed Outstanding Discovery Requests. [Defendant Answer]  
**Attachments:** INTERROGATORIES -- [DEFENDANT ANSWER].pdf; PLAINTIFF COMMODITY FUTURES TRADING COMMISSION'S FIRST SET OF DOCUMENT REQUESTS TO DEFENDANT PATRICK K. MCDONNELL [DEFENDANT ANSWER].pdf

Hi Gates,

Here is the completed requests as per your email earlier sir.

Regards,

Patrick

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**PLAINTIFF COMMODITY FUTURES TRADING COMMISSION'S FIRST SET OF DOCUMENT REQUESTS TO DEFENDANT PATRICK K. MCDONNELL [DEFENDANT ANSWER]**

1. All documents and communications that you have used or may use to support your defense of the Commission's claims, including but not limited to materials you used in preparation for or during the March 6, 2018 Hearing, or that you referred to during the April 12, 2018 telephone conference before Chief Magistrate Judge Mann.

**Defendant does not possess enough specific information to answer this question.**

2. All documents and communications relating to accounts under the name of or under the control of McDonnell.

**Defendant does not possess enough specific information to answer this question.**

3. All documents and communications concerning transactions that related to McDonnell and/or CDM and involved any virtual currency, including but not limited to those identifying virtual currency addresses and transaction IDs relating to CDM and/or McDonnell.

**Defendant does not possess enough specific information to answer this question.**

4. All documents and communications relating to CDM. These documents and communications should include but not be limited to the following:

a. All documents and communications relating to clients and potential clients of CDM.

b. All documents and communications relating to solicitation materials developed, used by or in the possession of CDM.

c. All documents and communications relating to trading conducted by or under the authority of McDonnell and/or CDM, including but not limited to accounts opened at futures commission merchants, virtual currency exchanges, or any other trading firm or service facilitating trading of virtual currency.

**Defendant does not possess enough specific information to answer this question.**

d. All documents and communications related to CDM's websites, including but not limited to the following:

i. the trading track record posted on CDM's websites, such as without limitation increased bitcoin balances and protections against volatility;

ii. the trading performance, effectiveness, and/or functionality of CDM's trading strategies;

iii. the customer-related materials; and

iv. hosting, storage, functioning, or maintenance of the websites.

**Defendant does not possess enough specific information to answer this question.**

e. All documents and communications relating to accounts under the name of or under the control of CDM.

**Defendant does not possess enough specific information to answer this question.**

f. All documents relating to any individual, group, or entity conducting business with or on behalf of CDM.

**Defendant does not possess enough specific information to answer this question.**





**INTERROGATORIES -- [DEFENDANT ANSWER]**

**Interrogatory No. 1.** Identify all persons with knowledge of any information McDonnell has used or may use to support defenses of the Commission's claims.

**Defendant does not possess enough specific information to answer this question.**

**Interrogatory No. 2.** Identify all documents concerning any information McDonnell has used or may use to support defenses of the Commission's claims.

**Defendant does not possess enough specific information to answer this question.**

**Interrogatory No. 3.** Identify all persons with knowledge of customers and potential customers of CDM and/or McDonnell.

**Defendant does not possess enough specific information to answer this question.**

**Interrogatory No. 4.** Identify all documents concerning customers and potential customers of CDM and/or McDonnell.

**Defendant does not possess enough specific information to answer this question.**

**Interrogatory No. 5.** Identify all persons with knowledge of CDM solicitation materials developed, used by, or in the possession, custody, or control of CDM and/or McDonnell.

**Defendant does not possess enough specific information to answer this question.**

**Interrogatory No. 6.** Identify all documents concerning CDM solicitation materials developed, used by, or in the possession, custody, or control of CDM and/or McDonnell.

**Defendant does not possess enough specific information to answer this question.**

**Interrogatory No. 7.** Identify all persons with knowledge of trading conducted by or under the authority of McDonnell and/or CDM, including but not limited to accounts opened at futures commission merchants, virtual currency exchanges, or any other trading firm or service facilitating the trading of virtual currency.

**Defendant does not possess enough specific information to answer this question.**

**Interrogatory No. 8.** Identify all documents concerning trading conducted by or under the authority of McDonnell and/or CDM, including but not limited to accounts opened at futures commission merchants, virtual currency exchanges, or any other trading firm or service facilitating the trading of virtual currency.

**Defendant does not possess enough specific information to answer this question.**

**Interrogatory No. 9.** Identify all persons with knowledge of CDM's and/or McDonnell's trading track record posted on CDM website(s) or in CDM promotional materials.

**Defendant does not possess enough specific information to answer this question.**

**Interrogatory No. 10.** Identify all documents concerning CDM's and/or McDonnell's trading track record posted on CDM website(s) or in CDM promotional materials.

**Defendant does not possess enough specific information to answer this question.**

**Interrogatory No. 11.** Identify all persons with knowledge of accounts under the name of or under the control of McDonnell and/or CDM.

**Defendant does not possess enough specific information to answer this question.**

**Interrogatory No. 12.** Identify all documents concerning accounts under the name of or under the control of McDonnell and/or CDM.

**Defendant does not possess enough specific information to answer this question.**

**Interrogatory No. 13.** Identify all virtual currency addresses and transaction IDs relating to McDonnell and/or CDM. **Defendant does not possess enough specific information to answer this question.**



